

EXHIBIT G



Nico Banks <nico@bankslawoffice.com>

Re: Hough v. Wells Fargo - C.D. Cal. 2:24cv2886

1 message

Nico Banks <nico@bankslawoffice.com>
To: "Gettings, Dave" <Dave.Gettings@troutman.com>
Cc: "Lowe, Michael S." <Michael.Lowe@troutman.com>, "Lynch, John C." <john.lynch@troutman.com>, "richard@nerviglaw.com" <richard@nerviglaw.com>

Sun, Jun 30, 2024 at 8:26 PM

Dave,

There's one other category of documents that I realized we'd need from Wells Fargo to reach a deal regarding the subpoena: relevant transaction data for any third-party agents (payment processors, payment aggregators, etc.) over which Wells Fargo had supervisory responsibilities. So in total, we'd need: checks, wire transfer confirmations, account statements, and third-party agent transaction records.

Or, if the same information can be produced in a more easily accessible way (for example — a spreadsheet that shows all transaction data we're asking for), we would accept that too of course (and we'd prefer it).

Thanks,

Nico Banks, Esq.
Banks Law Office, P.C.
Pronouns: he/him
Tel.: 971-678-0036
712 H St NE,
Unit #8571,
Washington, DC 20002

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On Tue, Jun 25, 2024 at 9:18 PM Gettings, Dave <Dave.Gettings@troutman.com> wrote:

That sounds good. Please give my cell a call – 845.893.0182.

Dave Gettings

Partner

troutman pepper

Direct: 757.687.7747 | Mobile: 845.893.0182 | Internal: 17-7747
dave.gettings@troutman.com

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From: Nico Banks <nico@bankslawoffice.com>

Sent: Tuesday, June 25, 2024 5:25 PM

To: Gettings, Dave <Dave.Gettings@troutman.com>

Cc: Lowe, Michael S. <Michael.Lowe@troutman.com>; Lynch, John C. <john.lynch@troutman.com>;

richard@nerviglaw.com

#1771

Subject: Re: Hough v. Wells Fargo - C.D. Cal. 2:24cv2886

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Sorry -- just to clarify, I will plan to call you at 3pm pacific / 6pm eastern (or we can meet on Teams if you'd rather).

Thanks,

Nico Banks, Esq.

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On Tue, Jun 25, 2024 at 8:24 PM Nico Banks <nico@bankslawoffice.com> wrote:

Hi Dave,

6pm tomorrow works for me.

Thanks,

Nico Banks, Esq.

Banks Law Office, P.C.

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[Washington, DC 20002](#)

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On Tue, Jun 25, 2024 at 8:17 PM Gettings, Dave <Dave.Gettings@troutman.com> wrote:

Nico,

I am on Pacific time tomorrow. Is 6pm ET / 3pm PT too late for you?

Dave

Dave Gettings

Partner

troutman pepper

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dave.gettings@troutman.com

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From: Nico Banks <nico@bankslawoffice.com>

Sent: Tuesday, June 25, 2024 1:28 PM

To: Gettings, Dave <Dave.Gettings@troutman.com#1773>

Cc: Lowe, Michael S. <Michael.Lowe@troutman.com>; Lynch, John C. <john.lynch@troutman.com>; richard@nerviglaw.com

Subject: Re: Hough v. Wells Fargo - C.D. Cal. 2:24cv2886

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Hi Dave,

I'm free anytime on Wednesday.

Thanks,

Nico Banks, Esq.
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On Mon, Jun 24, 2024 at 4:54 PM Gettings, Dave <Dave.Gettings@troutman.com> wrote:

Nico,

I will be flying all day tomorrow. How does your schedule look on Wednesday to discuss?

Dave

Dave Gettings

Partner

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dave.gettings@troutman.com

From: Nico Banks <nico@bankslawoffice.com>**Sent:** Friday, June 21, 2024 7:14 PM**To:** Gettings, Dave <Dave.Gettings@troutman.com>**Cc:** Lowe, Michael S. <Michael.Lowe@troutman.com>; Lynch, John C. <john.lynch@troutman.com>; richard@nerviglaw.com**Subject:** Re: Hough v. Wells Fargo - C.D. Cal. 2:24cv2886

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Dave,

Thanks for your email.

I'm a little frustrated because Wells Fargo has known that these are urgent issues since the subpoenas were issued on May 16, and we've been trying to confer with Wells Fargo about this for a while. I know it may not be your personal fault because you came onto this case recently, but your client's delay in articulating its position on this subpoena seems dilatory.

I'm not going to be reachable on Monday or Tuesday morning of next week, but I'd like to confer on Tuesday afternoon. If we haven't resolved these issues by the end of the day on Wednesday of next week, I intend to file a motion to compel along with an ex parte motion requesting an expedited briefing schedule.

Thanks,

Nico Banks, Esq.

Banks Law Office, P.C.

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On Wed, Jun 19, 2024 at 7:58 PM Gettings, Dave <Dave.Gettings@troutman.com> wrote:

Nico,

We are still coordinating with our client regarding the subpoena. We will get back to you soon. When we talked earlier this week, you had asked for an update by Wednesday. I am working on it and will get back to you as soon as possible.

Thanks,

Dave

Dave Gettings

Partner

troutman pepper

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dave.gettings@troutman.com

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From: Nico Banks <nico@bankslawoffice.com>
Sent: Monday, June 17, 2024 2:24 PM
To: Gettings, Dave <Dave.Gettings@troutman.com>
Cc: Lowe, Michael S. <Michael.Lowe@troutman.com>; Lynch, John C. <john.lynch@troutman.com>; richard@nerviglaw.com
Subject: Re: Hough v. Wells Fargo - C.D. Cal. 2:24cv2886

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Hi all,

I just wanted to flag that Wealth Assistants filed a motion to quash on Friday night. I still think we should continue negotiations regarding the subpoena now because the motion to quash is frivolous. And hypothetically if Wells and Plaintiffs end up at an impasse, we could litigate a motion to compel in parallel with the motion to quash.

Thanks,

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On Thu, Jun 13, 2024 at 8:19 PM Gettings, Dave <Dave.Gettings@troutman.com> wrote:

Nico,

10am PT works well. We can use the Teams information below.

Please forgive me as I am getting oriented to the case, are you referencing a subpoena under Rule 45? It is not clear to me how a party to the case can be subject to discovery through a third-party subpoena.

Thanks,

Dave

Microsoft Teams Need help?

Join the meeting now

Meeting ID: 236 795 606 913

Passcode: jH9kuz

Dial in by phone

+1 404-750-4631,,323317567# United States, Atlanta

Find a local number

Phone conference ID: 323 317 567#

Join on a video conferencing device

Tenant key: teams@meet.troutman.com

Video ID: 117 528 086 9

More info

For organizers: Meeting options | Reset dial-in PIN

Dave Gettings

Partner

troutman pepper

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dave.gettings@troutman.com

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From: Nico Banks <nico@bankslawoffice.com>

Sent: Thursday, June 13, 2024 5:08 PM

To: Gettings, Dave <Dave.Gettings@troutman.com>

Cc: Lowe, Michael S. <Michael.Lowe@troutman.com>; Lynch, John C. <john.lynch@troutman.com>; richard@nerviglaw.com

Subject: Re: Hough v. Wells Fargo - C.D. Cal. 2:24cv2886

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Hi Dave,

It's nice to e-meet you. I'm widely available for a call to generally discuss the matter on Monday. Would 10am pacific time work for you?

My primary concern, which is time sensitive, is Wells Fargo's response to our subpoena. I need to see the transaction records as soon as possible so that I can continue tracing the other defendants' assets. The previous counsel let me know that Wells Fargo wanted to confer about that further, which I'm happy to do, but I need to resolve that matter when we speak on Monday so that I can move to compel right away if I need to.

Thanks,

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On Thu, Jun 13, 2024 at 4:42 PM Gettings, Dave <Dave.Gettings@troutman.com> wrote:

Nico,

Wells Fargo retained our firm to defend the bank in the *Hough* matter that you brought. If you are available, I think it would be good to jump on a call early next week to discuss the case generally. I have pretty good availability on Monday. Are you available for a call?

Thanks,
Dave

Dave Gettings
Partner

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